

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**KERRY ROBINSON, on behalf of
himself and all others similarly
situated,**

Plaintiff,

v.

**GENERAL INFORMATION
SERVICES, INC.,**

Defendant.

C.A. No. 11-7782

CLASS ACTION

MOTION TO PERMIT FILING UNDER SEAL

Plaintiff Kerry Robinson, by counsel, respectfully requests that the Court enter the attached proposed Order permitting the filing under seal of certain documents relating to Plaintiff’s Motion for Final Approval of Class Action Settlement (“Motion”), and assigns the following reasons in support thereof.

1. Pursuant to the Court’s order granting preliminary approval of the settlement agreement, the mutually agreed upon Settlement Administrator, The Garden City Group, mailed the approved Class Notice to 293 members of the 1681e Class and 5,064 members of the 1681k Class individuals identified by Defendant as members of the Settlement Class. *See* Preliminary Approval Order, Doc. 46 at ¶ 10(b)-(c) and Exhibits C and D thereto.

2. The Class Notice informed Settlement Class Members, *inter alia*, of their right to exclude themselves from the class by submitting an Exclusion Request. *See Id.* at ¶ 14 and Exhibits C and D thereto.

3. To date, the Settlement Administrator has received two (2) Exclusion Requests from Settlement Class members. *See* Affidavit of Jennifer M. Keogh Regarding Administration, Doc. 47-2 at ¶ 6.

4. The list of Exclusion Requests is attached to the proposed Final Order as Exhibit A.

5. The list of Exclusion Requests of class members contains personal identifying information, including class members' home addresses.

6. Because the 1681k Class consists of persons who have been reported as having criminal records and the 1681e(b) Class includes persons who have had criminal records expunged from the public record, sealing of the list of Exclusion Requests will protect the privacy of class members who have taken steps to remove themselves from this case.

7. Pursuant to Local Rule 5.1.5(a)(2), documents may be filed under seal only if the Court first enters an Order allowing the filing under seal.

WHEREFORE, Plaintiff Kerry Robinson respectfully requests that this Honorable Court grant this Motion and enter an Order in the form proposed herewith, permitting Plaintiff to file under seal documents designated as "Confidential."

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

Dated: October 24, 2014

By: /s/ James A. Francis
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Attorneys for Plaintiffs and the Class

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CLASS ACTION

[PROPOSED] ORDER ALLOWING FILING UNDER SEAL

This matter is before the Court on the Plaintiff's Motion to Permit Filing Under Seal of Exhibit A to the proposed Final Order approving the class action. Upon consideration of this matter, the Court hereby ORDERS that the Motion is GRANTED.

IT IS SO ORDERED, this _____ day of _____, 2014.

HON. PETRESE B. TUCKER, U.S.D.J.

CERTIFICATE OF SERVICE

I hereby certify that on the date below, a true and correct copy of the foregoing was served via the Court's ECF Notification system upon all counsel of record.

Dated: October 24, 2014

s/ James A. Francis
James A. Francis